

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

**In re:**

**W.R. GRACE & CO., INC., et al.**

**Debtors.**

**Case No. 01-1139-JJF  
(Chapter 11)  
(Jointly Administered)**

\* \* \* \* \*

**AFFIDAVIT OF YVONNE FORD**

CITY OF BALTIMORE )

STATE OF MARYLAND )

TO WIT:

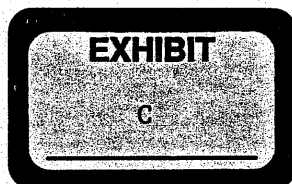
I, Yvonne Ford, being duly sworn, depose as follows and say:

1. I have monitored the docket approximately one to two times a week since the Reclamation Order (as defined in the Opposition) was entered in May 2001 pertaining to reclamation claims.

2. Since July 27, 2001, although the Web Pacer docket did not reflect entries subsequent to this date, I did not think this was unusual since I have found the docketing runs behind frequently on the Web Pacer system. I was unaware of the Delaware Bankruptcy Court's conversion of their docketing system to the CM/ECF system until August 23, 2001.

3. On July 30, 2001, I made a telephone call to Patricia Cuniff, a paralegal at Pachulski, Stang, Ziehl, Young & Jones (counsel to the Debtors), to inquire whether the Debtor had filed a motion pertaining to reclamation claims. Ms. Cuniff was unavailable when I called, and I left a voicemail message for her. I never received a response to my voicemail message.

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4. On August 10, 2001 I made two follow up telephone calls to Ms. Cuniff with regard to whether the Debtor had filed a motion pertaining to reclamation claims. Ms. Cuniff was again unavailable when I called, and I left two voicemail messages. I never received a response to my messages.

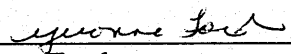
5. On August 17, 2001, I again telephoned Ms. Cuniff, and left another message requesting a telephone call back regarding whether the Debtor had filed a motion pertaining to reclamation claims. I did not receive a response to my message.

6. On August 17, 2001, I requested from Parcels, Inc., a copy of the W.R. Grace docket for the period from July 15, 2001 through August 17, 2001. The docket was faxed to our office at approximately 11:59 a.m. The docket provided ends at docket entry number 749 on July 27, 2001. A copy of the docket provided is attached hereto as Exhibit 1. Upon review of this docket, I again believed I had no way of confirming what documents had been filed with the Delaware Bankruptcy Court since July 27, 2001.

7. On August 23, 2001, I discovered that the Delaware Bankruptcy Court's docketing system had been converted to the CM/ECF system.

8. On August 23, 2001, after reviewing the docket in this case under the CM/ECF system, I discovered that the Debtors filed the Motion (as defined in the Opposition).

I DO SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE CONTENTS OF THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEF.

  
\_\_\_\_\_  
Yvonne Ford

**U.S. Bankruptcy Court  
District of Delaware (Delaware)  
Bankruptcy Petition #: 01-01139-JJF**

*Assigned to:* Joseph J. Farnan Jr  
Chapter 11  
Previous chapter 11  
Voluntary  
Asset

*Date Filed:* 04/02/2001

**W.R. GRACE & CO.**  
7500 Grace Drive  
Columbia, MD 21044  
SSN: NA  
Tax id: 65-0773649  
**Debtor**

**LAURA  
DAVIS JONES  
PACHULSKI,  
STANG, ZIEHL  
ET AL**  
represented by  
**P.O. BOX 8705  
WILMINGTON,  
DE 19899-8705  
302 652-4100**

**NOT YET APPOINTED**  
**Trustee**

Filing Date	#	Docket Text
07/27/2001	749	SUPPLEMENTAL Affidavit and Disclosure on Behalf of FTI Policano & Manzo [Edwin N. Ordway Jr.] , [CN] CERTIFICATE of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #698 (Entered: 07/27/2001)
07/27/2001	748	APPLICATION for Compensation and for Reimbursement of Expenses [First Interim] [6/16/01 - 6/30/01] [Campbell & Levine LLC] [Filed by Matthew G. Zaleski, atty/ OFFICIAL COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS] , [CN]

EXHIBIT

{SystemName} - {EventTitle}

		NOTICE of Application [Hearing only if objections filed by 8/17/01 at 4:00 pm] , [CN], ORIGINAL NIBS DOCKET ENTRY #697 (Entered: 07/27/2001)
07/27/2001	747	APPLICATION for Compensation and for Reimbursement of Expenses [First Interim] [4/12/01 - 6/30/01] [Caplin & Drysdale Chartered] [Filed by Rita C. Tobin, atty/ OFFICIAL COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS] , [CN] NOTICE of Application [Hearing only if objections filed by 8/17/01 AT 4:00 PM] , [CN], ORIGINAL NIBS DOCKET ENTRY #696 (Entered: 07/27/2001)
07/26/2001	746	AFFIDAVIT Under 11 U.S.C. • 327[e] [J. Douglas Drushal] , [CN] AFFIDAVIT of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #695 (Entered: 07/27/2001)
07/26/2001	745	AFFIDAVIT Under 11 U.S.C. • 327[e] [Barry Willner] , [CN] AFFIDAVIT of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #694 (Entered: 07/27/2001)
07/26/2001	744	AFFIDAVIT Under 11 U.S.C. • 327[e] [Charles L. Anderson] , [CN] AFFIDAVIT of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #693 (Entered: 07/27/2001)
07/26/2001	743	AFFIDAVIT Under 11 U.S.C. • 327[e] [Howard J. Coffey] , [CN] AFFIDAVIT of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #692 (Entered: 07/27/2001)
07/26/2001	742	AFFIDAVIT Under 11 U.S.C. • 327[e] [Kevin Wilson] , [CN] AFFIDAVIT of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #691 (Entered: 07/27/2001)

07/26/2001	741	AFFIDAVIT Under 11 U.S.C. • 327[e] [Pierre Cantin] , [CN] AFFIDAVIT of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #690 (Entered: 07/27/2001)
07/26/2001	740	AFFIDAVIT Under 11 U.S.C. • 327[e] [Beatrice Arronis] , [CN] AFFIDAVIT of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #689 (Entered: 07/27/2001)
07/26/2001	739	AFFIDAVIT Under 11 U.S.C. • 327[e] [Robert P. Kristoff] , [CN] AFFIDAVIT of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #688 (Entered: 07/27/2001)
07/26/2001	738	AFFIDAVIT Under 11 U.S.C. • 327[e] [John M. Agnello] , [CN] AFFIDAVIT of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #687 (Entered: 07/27/2001)
07/26/2001	737	AFFIDAVIT Under 11 U.S.C. • 327[e] [Gerald J. Petros] , [CN] AFFIDAVIT of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #686 (Entered: 07/27/2001)
07/26/2001	736	AFFIDAVIT Under 11 U.S.C. • 327[e] [Jonathan P. Pearson] , [CN] AFFIDAVIT of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #685 (Entered: 07/27/2001)
07/26/2001	735	AFFIDAVIT Under 11 U.S.C. • 327[e] [Edwin S. Hopson] , [CN] AFFIDAVIT of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #684 (Entered: 07/27/2001)
07/26/2001	734	AFFIDAVIT Under 11 U.S.C. • 327[e] [John McGahren] , [CN] AFFIDAVIT of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #683 (Entered: 07/27/2001)

07/26/2001	733	AFFIDAVIT Under 11 U.S.C. • 327[e] [John P. Merrick] , [CN] AFFIDAVIT of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #682 (Entered: 07/27/2001)
07/26/2001	732	AFFIDAVIT Under 11 U.S.C. • 327[e] [Alfred T. DeMaria] , [CN] AFFIDAVIT of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #681 (Entered: 07/27/2001)
07/26/2001	731	AFFIDAVIT Under 11 U.S.C. • 327[e] [Brian Doherty] , [CN] AFFIDAVIT of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #680 (Entered: 07/27/2001)
07/26/2001	730	AFFIDAVIT Under 11 U.S.C. • 327[e] [John R. Halleran] , [CN] AFFIDAVIT of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #679 (Entered: 07/27/2001)
07/26/2001	729	AFFIDAVIT Under 11 U.S.C. • 327[e] [Damon S. Bailey] , [CN] AFFIDAVIT of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #678 (Entered: 07/27/2001)
07/26/2001	728	AFFIDAVIT Under 11 U.S.C. • 327[e] [William F. Kershew] , [CN] AFFIDAVIT of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #677 (Entered: 07/27/2001)
07/26/2001	727	AFFIDAVIT Under 11 U.S.C. • 327[e] [Norman R. Buchsbaum] , [CN] AFFIDAVIT of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #676 (Entered: 07/27/2001)
07/26/2001	726	AFFIDAVIT Under 11 U.S.C. • 327[e] [Edward J. Fonti] , [CN] AFFIDAVIT of Service , [CN], ORIGINAL NIBS DOCKET ENTRY #675 (Entered: 07/27/2001)

07/25/2001	725	MOTION for Order Extending Debtors' Exclusive Periods in Which to File a Chapter 11 Plan and to Solicit Votes Thereon [filed by David Carickhoff, Atty./DEBTORS] , [DSC] NOTICE of Motion , [DSC] AFFIDAVIT of Service , [DSC], ORIGINAL NIBS DOCKET ENTRY #674 (Entered: 07/27/2001)
07/25/2001	724	CERTIFICATION of No Objection [filed by Rick Miller, Atty./OFFICIAL COMMITTEE OF ASBESTOS PROPERTY DAMAGE CLAIMANTS] Re: Item # 628, [DSC] CERTIFICATE of Service , [DSC], ORIGINAL NIBS DOCKET ENTRY #673 (Entered: 07/27/2001)
07/25/2001	723	CERTIFICATION of No Objection [filed by Rick Miller, Atty./OFFICIAL COMMITTEE OF ASBESTOS PROPERTY DAMAGE CLAIMANTS] Re: Item # 629, [DSC] CERTIFICATE of Service , [DSC], ORIGINAL NIBS DOCKET ENTRY #672 (Entered: 07/27/2001)
07/25/2001	722	AFFIDAVIT [THIRD SUPPLEMENTAL] of James H.M. Sprayregen , [DSC], ORIGINAL NIBS DOCKET ENTRY #671 (Entered: 07/27/2001)
07/25/2001	721	CERTIFICATION of No Objection [Filed by Rick Miller, Atty./OFFICIAL COMMITTEE OF ASBESTOS PROPERTY DAMAGE CLAIMANTS] Re: Item # 609, [DSC] CERTIFICATE of Service , [DSC], ORIGINAL NIBS DOCKET ENTRY #670 (Entered: 07/27/2001)
07/24/2001	720	WITHDRAWAL of Objection [filed by Beth E. Rogers, Atty./DALEEN TECHNOLOGIES, INC.] Re: Item # 337, [DSC], ORIGINAL NIBS DOCKET ENTRY #669 (Entered: 07/27/2001)

{SystemName} - {EventTitle}

07/24/2001	719	MOTION for Admission Pro Hac Vice [Filed by David Foust, Asst. Atty. Gen./MICHIGAN] , [DSC], ORIGINAL NIBS DOCKET ENTRY #668 (Entered: 07/27/2001)
07/24/2001	718	AFFIDAVIT of Service Re: Item # 717, [DSC], ORIGINAL NIBS DOCKET ENTRY #667 (Entered: 07/27/2001)
07/24/2001	717	MOTION for Admission Pro Hac Vice [Jay M. Sakalo, Esq.] [filed by Theodore Tacconelli, Atty./OFFICIAL COMMITTEE OF ASBESTOS PROPERTY DAMAGE CLAIMANTS] , [DSC], ORIGINAL NIBS DOCKET ENTRY #666 (Entered: 07/27/2001)
07/24/2001	716	TRANSCRIPT of Hearing July 19, 2001 , [DSC], ORIGINAL NIBS DOCKET ENTRY #665 (Entered: 07/27/2001)
07/23/2001	715	CREDITOR'S Notice of Hearing on 09/07/01 at 01:00 P.M. at U.S. District Court, 844 King Street, Wilmington, 19801, [DSC], ORIGINAL NIBS DOCKET ENTRY #664 (Entered: 07/27/2001)
07/23/2001	705	NOTICE of Appearance and Request for Service of Notices and Documents [Filed by Susan Breymaier, Atty/U.S. POSTAL SERVICE] , [MDW] CERTIFICATE of Service , [MDW], ORIGINAL NIBS DOCKET ENTRY #654 (Entered: 07/27/2001)
07/23/2001	704	MOTION for Admission Pro Hac Vice of Randall S. Royer [Filed by same] , [MDW], ORIGINAL NIBS DOCKET ENTRY #653 (Entered: 07/27/2001)
07/23/2001	703	MOTION for Admission Pro Hac Vice of Thomas A. Kulick [Filed by same] , [MDW], ORIGINAL NIBS DOCKET ENTRY #652 (Entered: 07/27/2001)



07/23/2001	702	MOTION for Order Compelling Debtors to Supplement Statements of Financial Affairs [Filed by James D. Freeman, Atty/U.S. DEPARTMENT OF JUSTICE ENVIRONMENTAL ENFORCEMENT SECTION] ; [MDW] MEMORANDUM in Support of Motion , [MDW] NOTICE of Motion and Hearing [Hearing only if objections filed by 8/30/01 at 4:00 PM] on 09/07/01 at 01:00 P.M. at U.S. District Court, 844 King Street, 6th Floor, Courtroom #6A, Wilmington, 19801, [MDW] CERTIFICATE of Service , [MDW], ORIGINAL NIBS DOCKET ENTRY #651 (Entered: 07/27/2001)
07/20/2001	714	NOTICE of Appearance and Request for Service of Notices and Documents [filed by Christopher Momjian, Senior Deputy Attorney General/STATE OF PENNSYLVANIA] , [DSC], ORIGINAL NIBS DOCKET ENTRY #663 (Entered: 07/27/2001)
07/19/2001	713	COURT Reporter's Tape from Hearing on July 19, 2001 , [DSC], ORIGINAL NIBS DOCKET ENTRY #662 (Entered: 07/27/2001)
07/19/2001	712	NOTICE of Appearance and Request for Service of Notices and Documents [Filed by Thomas Matz, Atty./SNACK, INC.] , [DSC] CERTIFICATE of Service , [DSC], ORIGINAL NIBS DOCKET ENTRY #661 (Entered: 07/27/2001)
07/19/2001	711	ORDER Signed and Located in Original Document Re: Item # 690, [DSC], ORIGINAL NIBS DOCKET ENTRY #660 (Entered: 07/27/2001)
07/19/2001	710	ORDER Authorizing the Employment and Retention of Kinsella Communications, Ltd. as Notice Consultant for the Debtors and Debtors in Possession , [DSC], ORIGINAL NIBS DOCKET ENTRY #659 (Entered: 07/27/2001)

07/19/2001	709	ORDER Authorizing and Approving an Omnibus Procedure for Settling Certain Claims and Causes of Action Brought by or Against the Debtors in a Judicial, Administrative, Arbitral or Other Action or Proceeding , [DSC], ORIGINAL NIBS DOCKET ENTRY #658 (Entered: 07/27/2001)
07/19/2001	708	ORDER Extending the Period Within Which the Debtors May Remove Actions , [DSC], ORIGINAL NIBS DOCKET ENTRY #657 (Entered: 07/27/2001)
07/19/2001	707	ORDER Authorizing the Retention and Employment of Reed Smith LLp as Special Asbestos Products Liability Defense Counsel for the Debtors , [DSC], ORIGINAL NIBS DOCKET ENTRY #656 (Entered: 07/27/2001)
07/19/2001	706	ORDER Authorizing the Retention and Employment of Holme Roberts & Owen LLp as Special Environmental Counsel for the Debtors , [DSC], ORIGINAL NIBS DOCKET ENTRY #655 (Entered: 07/27/2001)
07/19/2001	701	ORDER Authorizing Debtors to Employ Nelson Mullins Riley & Scarborough, LLP as Special Counsel to the Debtors , [SBM], ORIGINAL NIBS DOCKET ENTRY #650 (Entered: 07/26/2001)
07/19/2001	700	HEARING Held [OMNIBUS] [See Proceeding Memo] , [SBM], ORIGINAL NIBS DOCKET ENTRY #649 (Entered: 07/26/2001)
07/18/2001	698	ORDER Signed and Located in Original Document Authorizing Retention of Counsel/OFFICIAL COMMITTEE/ASBESTOS PERSONAL INJURY CLAIMANTS.][Order actually located in Doc #632] [CAMPBELL & LEVINE, LLC] Re: Item # 602, [JW], ORIGINAL NIBS DOCKET ENTRY #647 (Entered: 07/19/2001)

07/18/2001	697	ORDER Signed and Located in Original Document Authorizing Retention of Delaware Counsel/COMMITTEE/Asbestos Personal Injury Claimants Committee [Order actually located in Doc #579][ASHBY & GEDDES, P.A.] Re: Item # 528, [JW], ORIGINAL NIBS DOCKET ENTRY #646 (Entered: 07/19/2001)
07/18/2001	696	ORDER Signed and Located in Original Document Re: Item # 627, [JW], ORIGINAL NIBS DOCKET ENTRY #645 (Entered: 07/19/2001)
07/18/2001	695	ORDER Signed and Located in Original Document Authorizing Employment of Special Counsel [Nelson Mullins Riley & Scarborough, LLP] Re: Item # 500, [JW], ORIGINAL NIBS DOCKET ENTRY #644 (Entered: 07/19/2001)
07/18/2001	694	ORDER Signed and Located in Original Document Authorizing Retention & Employment of Special Environmental Counsel [Holme Roberts & Owen LLP] Re: Item # 483, [JW], ORIGINAL NIBS DOCKET ENTRY #643 (Entered: 07/19/2001)
07/18/2001	693	ORDER Signed and Located in Original Document [Shorten Notice] Re: Item # 665, [JW], ORIGINAL NIBS DOCKET ENTRY #642 (Entered: 07/19/2001)
07/18/2001	692	RESPONSE to Joint Motion for Authority to Prosecute Fraudulent Transfer Claims [CORRECTED] [Filed by Cheryl Siskin, Atty./SEALED AIR CORPORATION.] Re: Item # 656, [JW] & Re: Item # 600, [JW] CERTIFICATE of Service , [JW], ORIGINAL NIBS DOCKET ENTRY #641 (Entered: 07/19/2001)

07/18/2001	691	COUNSEL'S Agenda with Matters Scheduled [AMENDED] on 07/19/01 at 12:00 P.M. at Alternate Meeting Site, See Docket for More Information Re: Item # 686, [JW], ORIGINAL NIBS DOCKET ENTRY #640 (Entered: 07/19/2001)
07/18/2001	690	MOTION for Admission Pro Hac Vice w/Certifications [Elihu Inselbuch, Esq., Rita C. Tobin, Esq., Julie W. Davis, Esq., Trevor W. Swett, III, Esq. & Nathan D. Finch, Esq.] [Filed by Matthew G. Zaleski, III, Atty./OFFICIAL COMMITTEE/ASBESTOS PERSONAL INJURY CLAIMANTS.], [JW] CERTIFICATE